

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

FILED
HARRISBURG, PA

2018 AUG 13 PM 2:55

CLERK
U.S. BANKRUPTCY COURT

THOMAS JAMES EDWARD SOUL,
Debtor

CHAPTER 13

CASE NO. 1:17-BK-04952-RNO

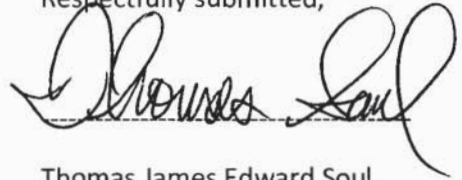
CWB

RESPONSE TO OBJECTION OF PNC BANK TO CONFIRMATION OF
CHAPTER 13 AMENDED PLAN

- 1). PNC alleges that a copy of Official Form 410 Proof of Claim was sent to Debtor on 4-5-18. Debtor has not, as of the date of 8-13-18, received a copy of this document. Debtor did receive a Request for Concurrence to File Motion for Relief, but no other documents were contained in the mailing.
- 2). Debtor has been attempting to secure Counsel to represent him in this matter, but to date has not been able to secure representation.
- 3). Regarding the arrears Debtor is fully prepared to pay to the Court Trustee the monies due beginning with the filing of his Chapter 13 claim.
- 4). Debtor is currently seeking to receive funding from an outside source to assist him in the repayment of the debt. Debtor needs additional time to complete this activity.
- 5). Debtor has been in contact with National Home Advocates, a company purported to be able to refinance his mortgage. A copy of said document allowing them to contact PNC directly on Debtor's behalf is enclosed.

WHEREFORE, in consideration of the above referenced material Debtor prays that this Court will continue the case and allow any and all other considerations available to Debtor in this matter.

Respectfully submitted,



Thomas James Edward Soul,

Debtor, Pro-se

92 B Cemetery Avenue

Stewartstown, PA 17363

(717) 434-9471



National Home Advocates

1500 Northwest Bethany Blvd Suite 200
Beaverton, OR 97006
Phone: (888) 977-5079 Fax: (541)255-3190

Borrower's Authorization Form

I/we authorize **National Home Advocates**, and their authorized employees, contractors and agents, to request, obtain, and verify any and all mortgage loan information. This includes, without limitation, payoff, arrearage, reinstatement amounts, work-out offers, rate and term modification, principal balance modifications, short sale initiations and proceedings, along with deed in lieu.

Additionally, I/we authorize **National Home Advocates**, and their authorized employees, contractors and agents to communicate on my/our behalf to obtain any of our personal, financial and credit history to our lender. Any and all information obtained and or shared on my/our behalf is to be used for the purpose of facilitating the expedient and timely resolution of our mortgage distress.

Additionally, I/we request, until we give further notice, that our lender direct all further telephone calls and correspondence to **National Home Advocates**, or their authorized employees, contractors and agents.

Thomas Sou
Borrower: _____ Co-Borrower _____
Thomas Sou
Signature: _____ Signature: _____
5509
Last four of SSN: _____ Last four of SSN: _____
8-3-18 1-30-56
Date: _____ Date of Birth: _____ Date: _____ Date of Birth: _____

Authorized members of the Firm:

- Nina Samone
- Wendy Lee
- Lily Woo
- Christina Fernandez

Please fill the box below completely:

Lender:	<u>PNB Mortgage</u>
Loan #:	<u>000 3744 557</u>
Subject Property:	<u>22 B Cemetery Avenue, Steadfast, PA 17343</u>

Attention: Kevin: 503.468.3436

*** Send Results ***

Sending is complete.

Job No.	3817
Address	15034683436
Name	
Start Time	08/03 07:07 PM
Call Length	00'36
Sheets	1
Result	OK